



Fourth Program Year Action Plan

The CPMP Fourth Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 4 Action Plan Executive Summary:

The Mobile County Commission serves as grantee and lead agency responsible for planning and implementing the Consolidated Plan. Direct implementation, administration and responsibility for the operation of the programs and activities set forth in the Consolidated Plan have been assigned to the Mobile County Grants Department.

Mobile County, along with the incorporated cities within the County outside of the City of Mobile, first became eligible for HUD formula grant funds following the 2000 U.S. Census when these jurisdictions combined to reach the statutory population level required. The Mobile County Consortium applied for and received its first funding during program year 2002.

This document, the Mobile County Consortium Annual Action Plan for 2013, represents a planning document for a jurisdiction that comprises of nine incorporated municipalities (Bayou La Batre, Chickasaw, Citronelle, Creola, Mount Vernon, Prichard, Saraland, Satsuma, and Semmes) and all of the unincorporated area of Mobile County, Alabama. The Town of Dauphin Island, elected to withdraw from the Consortium in 2008.

The Plan sets forth a specific plan for investment or use of formula grant funds and other public and private funds that are reasonably expected to be available during each program year. The Annual Action Plan provides a basis for assessing the Consortium's overall performance toward achieving the broad based goals and objectives set forth in the Five Year Consolidated Plan. The County's Five Year Consolidated Plan was amended in 2012 to reflect changes in HOME Program and to reflect changes due to the Emergency Solutions Grant. In 2013, the County's Five Year Consolidated Plan is in the process of being amended to reflect changes to the following sections: Community Development and Homeless.

In addition to a planning document, the Action Plan serves as an application for federal funds under the U. S. Department of Housing and Urban Development (HUD) formula grant programs. These grant programs, for which the Consortium is an entitlement recipient, include: the Community Development Block Grant (CDBG), the HOME Investment Partnership (HOME), the Emergency Solutions Grant (ESG), and the Housing Opportunity for Persons with AIDS (HOPWA). Based on a national funding formula established by Congress and implemented by HUD, the Consortium is a recipient under all of these formula grant programs with the exception of HOPWA.

The Mobile County Consortium utilizes outcome measures for activities in accordance with the Federal Register Notice dated March 7, 2006 that HUD published "Notice of Outcome Performance Measurement System for Community Planning and Development Formula Grant Programs". This notice outlined a system of objectives, along with outcome categories that are to be utilized by grantees when establishing and carrying out grant funded activities. A grantee is to determine which of three objectives best describes the purpose of the activity. These objectives, consistent with the primary objectives of Title I of the Housing and Community Development Act of 1974, are: "Suitable Living Environment", "Decent Housing", and "Creating Economic Opportunities". Similarly, once the objective for the activity is selected, the grantee will then choose which of three outcome categories best reflect the intention of the grantee in funding that activity. The outcomes are: "Availability/Accessibility", "Affordability", and "Sustainability: Promoting Livable or Viable Communities".

Based upon this system of objectives and outcomes, the objectives set forth in the Action Plan, with outcomes in parenthesis, are classified as follows:

Suitable Living Environment-

- Public Facilities (Availability/Accessibility)
- Public Infrastructure (Availability/Accessibility)
- Public Services (Availability/Accessibility)
- Handicapped Accessibility (Availability/Accessibility)

Decent Housing-

- Down Payment Assistance (Affordability)
- DPA Housing Counseling (Affordability)
- Affordable Housing Construction (Affordability)

Overall goals of the community planning and development programs addressed in the Consolidated Plan are to develop viable urban communities by providing decent housing and a suitable living environment, and expanding economic opportunities principally for low- and moderate-income persons. To strive towards meeting these goals, this document describes how the Consortium hopes to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of affordable housing, public works/public facilities and public services.

In 2013 CDBG funds are allocated to improving infrastructure through the following projects: waterline relocation and resurfacing roads. CDBG funds are allocated for rehabilitation/accessibility improvements to a group home for individuals with developmental disabilities, construction of a homeless facility, and public school improvements.

In 2013, CDBG Funds are committed to the provision of the following public services: homebuyer counseling, prescription drug assistance, assistance for child abuse victims and non-offending family members, ADA-compliant home modifications, rape victim service provider assistance, senior services activities, juvenile transitional program services, youth summer program, and domestic violence victim advocacy.

With the HOME Program, the Consortium's main focus during the fourth year remains the provision of affordable housing. The Consortium supports HUD's national goal of increasing homeownership and rental opportunities for low- and moderate-income persons, especially for minority households. Affordable housing is further supported with the provision of down payment assistance and homeownership counseling. Mortgage assistance is also available for housing constructed with HOME funds.

The Consortium supports HUD's national goal of ending homelessness. In this regard, the Consortium focuses on programs and activities targeted at assisting persons at imminent risk of becoming homeless, thereby preventing homelessness as well as those defined as homeless. Additionally, the Consortium supports and encourages the efforts of the Continuum of Care organization that serves Mobile County for the development of permanent supportive housing to end chronic homelessness. The prevention of homelessness has become a major strategy coordinated by the Continuum of Care for assisting households at imminent risk.

In 2013, the County anticipates receiving ESG funds. Mobile County has met with Housing First, Inc., the Continuum of Care lead organization, and plans to enter into a non-competitive sub-recipient agreement with them to manage the competitive process and execute sub-recipient agreements for organizations selected for ESG activities.

Housing First, Inc. has gained substantial experience by administering the Emergency Solutions Grant allocations for 2011 and 2012 as well as the Homelessness Prevention Rapid Re-Housing Program (HPRP) for Mobile County. They also have experience as a HUD SHP grantee and as a sub-grantee for local HUD funds. Housing First, Inc. operates the jurisdictional Homeless Management Information System (HMIS) and manages permanent and transitional housing projects. Based on their prior successes working with ESG, HPRP and other homeless programs, Housing First, Inc. has the capacity to administer the Mobile County Emergency Solutions Grant Program in an effective manner.

Upon HUD approval of the 2013 Action Plan, Mobile County Commission would proceed with the sub-recipient agreement with Housing First, Inc. to create the structure and process required for HMIS, the clearinghouse for clients served, the ESG services to target, and the capacity for financial management of ESG funds. Housing First, Inc. would extend sub-recipient agreements to established organizations for ESG activities. Activities eligible for funding under ESG include the following: street outreach, emergency shelter, homelessness prevention, rapid re-housing, and administration. An announcement and application would be distributed to eligible CoC organizations that participate in HMIS, agree to participate in HMIS, or use an approved comparable database (such as domestic violence shelters). A review committee with representation from the CoC board of directors would make recommendations to the Mobile County Commission regarding the suitability and capacities of sub-recipient applicants. The Mobile County Commission would approve and authorize Housing First, Inc. to execute sub-recipient agreements.

The broader goals expressed in the Consolidated Plan establish the Mobile County Consortium's priorities for housing and non-housing community development needs, the need categories of economic development, public facilities, public infrastructure, public services, and planning. Within these broader categories of housing and non-housing needs are established relative priorities for various specific sub-categories. The priorities are set forth in the Housing Needs Table and Community Development Needs in the Consolidated Plan.

The Consortium holds public hearings and accepts funding proposals for CDBG each program year from public and private agencies within a deadline established annually. All proposals are reviewed by a Project Review Committee and a recommended budget is presented to the Mobile County Commission for review and final action. The Committee considers proposals based upon eligibility criteria set forth in the federal regulations promulgated by HUD, the extent to which proposals address the priorities and support the goals established in the Consolidated Plan, and how the proposals fit into the availability of formula grant funds. The annual program year for the Mobile County Consortium is June 1 to May 31.

Over the years the County has 1) pursued all resources that it indicated it would pursue, 2) provided requested certifications of consistency for HUD programs in a fair and impartial manner for those programs which it indicated it would support applications by other entities, and 3) did not hinder Consolidated Plan implementation by action or willful inaction. The County has continued to carry out the actions and strategies outlined in its Consolidated Plan, except for instances where federal funding programs are not available or where resources could not be procured, the County has stayed with established priorities and commitments.

A summary of the proposed plan follows:

PROPOSED 2013 YEAR FOUR ACTION PLAN SUMMARY

Mobile County Commission as the lead agency of the Mobile County Consortium is required to prepare an Action Plan for each year of the five-year planning period covered by the Consolidated Plan. The Consolidated Plan includes strategies for addressing some of the identified community needs with Community Development Block Grant (CDBG) funds, HOME funds, and Emergency Solutions Grant (ESG) Funds.

The Year Four Action Plan outlines proposed activities to be undertaken with CDBG funds, HOME funds, and ESG funds in 2013. At the time of publication, entitlement allocations are not known. For budget purposes, a 15% reduction from the 2012 allocations was used. Based upon this assumption, the County anticipates the following allocations in 2013: CDBG \$1,378,003, HOME \$462,729, and ESG \$131,870. In addition for the 2013 CDBG budget, previous years reallocated CDBG funds of \$54,737 was used. In addition for the 2013 HOME budget, \$300,000 in anticipated HOME Program Income was used. The following is a description of the proposed budget for each program:

COMMUNITY DEVELOPMENT BLOCK GRANT

Public Facilities/Works:

| | |
|--|------------|
| 1. Road Resurfacing – City of Prichard | \$ 220,000 |
| 2. Road Resurfacing – City of Chickasaw | \$ 125,000 |
| 3. Waterline Relocation – Mobile County unincorporated areas | \$ 242,426 |
| 4. Public School Improvements | \$ 244,514 |
| 5. Construction of Homeless Facility | \$ 100,000 |
| 6. Rehabilitation and Accessibility for Group Home | \$ 18,500 |
| Total amount allocated to public facilities/works | \$ 950,440 |

Public Services:

| | |
|---|------------|
| 7. Homebuyer Counseling | \$ 25,000 |
| 8. Prescription Drug Assistance | \$ 10,000 |
| 9. Child Abuse Victim Assistance | \$ 16,200 |
| 10. Home Modifications- ADA Compliant | \$ 10,000 |
| 11. Senior Services Activities | \$ 50,000 |
| 12. Victim Service Provider Assistance | \$ 13,000 |
| 13. Domestic Violence Victim Advocacy | \$ 7,500 |
| 14. Summer Youth Program | \$ 25,000 |
| 15. Juvenile Transitional Program | \$ 50,000 |
| Total amount allocated to public services | \$ 206,700 |

Planning and Administration:

| | |
|---|-------------|
| 16. Comprehensive Watershed Plan | \$ 18,000 |
| 17. General Program Administration | \$ 257,600 |
| Total amount allocated to Planning and Administration | \$ 275,600 |
| TOTAL CDBG BUDGET | \$1,432,740 |

HOME

Affordable Housing:

| | |
|--|------------|
| Construction and permanent financing of rental housing for the elderly | \$ 500,000 |
| CHDO: Construction of up to two single family homes | \$ 186,457 |
| Program Administration | \$ 46,272 |
| Program Administration from Anticipated Program Income | \$ 30,000 |
| TOTAL HOME BUDGET | \$ 762,729 |

EMERGENCY SOLUTIONS GRANT

| | |
|---|------------|
| Emergency Shelter | \$ 50,000 |
| Homelessness Prevention | \$ 40,000 |
| Homeless Information Management System (HMIS) | \$ 31,980 |
| Administration | \$ 9,890 |
| TOTAL ESG BUDGET | \$ 131,870 |

Mobile County published a notice of public hearings/comment period of the 2013 Action Plan on February 27, 2013 in the Mobile Register, the Beacon and the Call News. A summary of the Action Plan was published on March 8, 2013 in the Mobile Register. A Public Hearings are being held on March 8, 2013 and April 9, 2013. A 30-day comment period, which ends on April 8, 2013, is required prior to the adoption of the Action Plan on April 9, 2013 by the Mobile County Commission and submission to HUD. Comments or suggestions concerning this Action Plan are to be submitted in writing by 4:00 p.m. on April 8, 2013 to Mr. John Pafenbach, County Administrator, Mobile County Commission, P. O. Box 1443, Mobile, AL 36633.

The following table indicates a total entitlement figure of \$2,327,339 and describes the components of that amount:

TABLE A: Federal Resources Fiscal Year 2013 (June 1, 2013 – May 31, 2014)

| FUNDING SOURCE | AMOUNT |
|--|-------------|
| 2013 HUD Community Development Block Grant (CDBG) allocation | \$1,378,003 |
| ** Reallocated CDBG funds from previous year(s) | \$54,737 |
| 2013 HUD Home Investment Partnership Act (HOME) allocation | \$462,729 |
| HOME Program Income (Anticipated) | \$300,000 |
| Emergency Solutions Grant | \$131,870 |
| Total | \$2,327,339 |

**Reallocated CDBG funds from previous years are from activities that were completed under the original budget. Adding these unused funds to the 2013 budget would constitute a formal amendment.

| Program Year | CDBG Activity | Unused Funds |
|--------------|--|--------------|
| 2010 | Prichard Street Resurfacing (complete) | \$3,491.35 |
| 2010 | Chickasaw Handicap Ramps (complete) | \$45,993.74 |
| 2010 | Davis Park Improvements (complete) | \$5,192.73 |
| 2011 | Public School Playground Improvements (complete) | \$60.00 |
| | Total Unused Funds | \$54,737.82 |

Match Requirements for the HOME Funds:

HOME funds match will be in the form of in-kind or cash contributions. If the total revenue match is larger than the required match expense, the difference will be accumulated to be used to meet match requirements when needed. In-kind or cash match will be contributed from the accumulated match, when HOME funds are drawn.

DESCRIPTION OF ACTIVITIES TO BE UNDERTAKEN IN YEAR FOUR:

A. CDBG FUNDS

The total amount of CDBG funds available for the 2013 Year Four Action Plan (June 1, 2013 – May 31, 2014) is \$1,432,740. That amount represents the 2013 allocation of \$1,378,003 and reallocated funds of \$54,737. No program income or urban renewal settlements are anticipated this year. A description of CDBG activities selected for 2013, the fourth year of the five-year consolidated planning period is shown in Table B that follows:

TABLE B: ACTIVITIES TO BE UNDERTAKEN WITH CDBG FUNDS
(\$1,378,003 + \$54,737 reallocated funds)

| | | |
|--|------------------------------------|------------------|
| A/B. Public Facilities/Works | | \$950,440 |
| Activity | Location | Amount Allocated |
| 1. Road Resurfacing | City of Prichard | \$220,000 |
| 2. Road Resurfacing | City of Chickasaw | \$125,000 |
| 3. Waterline Relocation | Mobile County unincorporated areas | \$242,426 |
| 4. Public School Improvements | Mobile County | \$244,514 |
| 5. Construction of Homeless Facility | City of Mobile | \$100,000 |
| 6. Rehabilitation/Accessibility for Group Home | West Mobile County | \$18,500 |
| C. Public Services | | \$206,700 |
| Activity | Location | Amount Allocated |
| 7. Homebuyer Counseling | County Wide | \$25,000 |
| 8. Prescription Drug Assistance | County Wide | \$10,000 |
| 9. Child Abuse Victim Assistance | County Wide | \$16,200 |
| 10. Home Modifications – ADA Compliant | County Wide | \$10,000 |
| 11. Senior Services Activities | West Mobile County | \$50,000 |
| 12. Victim Service Provider Assistance | County Wide | \$13,000 |
| 13. Domestic Violence Victim Advocacy | County Wide | \$7,500 |

| | | |
|---|---------------------|-------------|
| 14. Summer Youth Program | North Mobile County | \$25,000 |
| 15. Juvenile Transitional Program | County Wide | \$50,000 |
| D. Planning and Administration - General Administration, Planning and Studies | | \$275,600 |
| 16. Comprehensive Watershed Plan | | \$18,000 |
| 17. General Program Administration | | \$257,600 |
| Total CDBG Funds Available | | \$1,432,740 |

- Public Facilities/Public Works

1. Road Resurfacing- City of Prichard (LMA)

Provide funds to resurface roads in the City of Prichard located in low/mod area. Streets include: Cranberry Street, West Clark Avenue, McCants Avenue, Vickers Avenue, Eckford Street, and Cedar Lane. Prichard is predominantly a low/mod jurisdiction. This project will improve the City's infrastructure. Proposed benefit: 3,128 people.

2. Road Resurfacing - City of Chickasaw (LMA)

Provide funds to resurface streets in the City of Chickasaw located in low/mod area. Streets include: Iroquois Street, Johnston Street, Gulf Street Alley NW, Gulf Street Alley SW, and Jefferson Street. Proposed benefit: 230 people.

3. Waterline Relocation – Mobile County unincorporated areas (LMA)

Provide funds for waterline relocation on two (2) streets in the unincorporated areas of Mobile County. These streets include: Albert Evans Road and Louis Tillman Road. Proposed benefit: 100 people.

4. Public School Improvements – Mobile County Public School System (LMC)

Provide funds for playground and recreational improvements, construction of a playground, covered walkways, and an outdoor classroom. The projects are located at four (4) low/mod schools in the County. Schools include: Wilmer Elementary, J. E. Turner Elementary, North Mobile County Middle School, and Calcedavor Elementary. Proposed benefit: 1,300 people

5. Construction of Homeless Facility – City of Mobile (LMC)

Provide funds toward construction of a homeless facility located within the City of Mobile to provide services to Mobile County's homeless population. The project includes: construction of a 100-bed shelter, construction of a day center, and construction of a medical facility.

The County received guidance from HUD that both Mobile County and the City of Mobile can assist an activity. Since the County will be assisting an activity outside of its jurisdiction, the County is responsible for meeting the provisions of 24 CFR 570.309. In accordance with 24 CFR 570.200(e), the County has determined that the

activity is necessary to further the purposes of the Housing and Community Development Act and the County's community development objectives and that reasonable benefits from the activity will accrue to County residents.

Since the County is providing \$100,000 toward total construction cost of \$3,765,103 or approximately 2.7% of the total construction cost. Therefore, it is reasonable that a minimum of 2.7% of the beneficiaries will be from the County. This assumption is not unreasonable, since data from the 2012 Point-in-Time (PIT) estimates that 31.1% of the homeless are Mobile County residents. The 2013 PIT is not available at this time.

To estimate the proposed benefit for County homeless from this project, the County used data from the CoC Annual Performance Report for 15 Place/Mobile Multi-Service Center. 15 Place will occupy the day center. The homeless tend to gravitate to 15 Place because of the array of services available to them. In the 2012 APR, 15 Place served a total of 1,348 clients. Based on a total of 1,348 clients, 2.7% of the total clients is 36 persons.

The project is already underway and the City of Mobile CDBG funds have been obligated to the project. We have been advised by the HUD Field Office that even though the project is underway and the City has conducted an environmental review, the County is responsible for conducting an Environmental Review and receiving release of funds. We have also been advised by HUD that the County's funds can be obligated toward the entire project and not for a specific facility. Proposed Benefit: 36 people

6. Rehabilitation/Accessibility for Group Home – West Mobile County (LMC)
Provide funds to rehabilitate/renovate the kitchen and provide accessibility improvements for the kitchen and residence. The home is owned and operated by Mobile Arc, a non-profit organization. Mobile Arc is a community-based, family-centered, advocacy and service system for persons with cognitive, intellectual, and developmental disabilities. The group home, Wood Home, serves individuals with developmental disabilities. Proposed Benefit: 7 people

- Public Services

7. Homebuyer Counseling
Provide funds to a nonprofit organization that has an established framework of communication and outreach to low- and moderate-income persons to conduct one-on-one housing counseling, Homebuyer Training classes and to provide affirmative marketing of the program. Homebuyer counseling provides low-income homebuyers a guide to the home buying process and good financial management pre and post purchase of a home. Homebuyer Training classes are offered to provide equal access to all residents of the County to the Down Payment Assistance program and the Construction of Affordable Homes Program. Proposed outcome: 200 people

8. Prescription Drug Assistance
Provide funds for a prescription drug assistance program, which provides pharmaceutical services at no cost to eligible low- and moderate-income persons. The program provides prescription medications as well as patient assistance service to aid patients with obtaining expensive name brand medications directly from the pharmaceutical companies. Proposed outcome: 150 people

9. Child Abuse Victim Assistance

Provide funds to assist with services that provide counseling and transportation to sexually abused child victims and their families living in Mobile County. Proposed outcome: 53 people

10. Home Modifications-ADA Compliant

Provide funds for home modifications for persons with disabilities to meet ADA guidelines. Modifications may include but are not limited to construction of ramps and the renovation of bathrooms and restrooms. Proposed outcome: up to 5 people

11. Senior Services Activities

Provide funds for a program director for a senior center to oversee programming, scheduling, and coordination of activities for persons age 62 and older that will be geared to the interests of the senior community plus designed to accommodate different ability levels. Proposed outcome: 300 people

12. Victim Service Provider Assistance

Provide funds to assist with direct services to sexual assault victims and their families. Proposed outcome: 60 people

13. Domestic Violence Victim Advocacy

Provide funds to assist a protection order assistance program for a domestic violence victims advocacy project with staffing expenses. Proposed outcome: 40 people

14. Summer Youth Program

Provide funds for a summer youth development program at sites in Mount Vernon and Citronelle that will serve low/moderate income youth. Proposed outcome: 150 people

15. Juvenile Transitional Program

Provide funds for a transitional program for juveniles involved in the court system. The program is operated by a non-profit organization. Proposed outcome: 15 people.

- General Administration Planning and Studies

16. Comprehensive Watershed Plan

Provide funds for a comprehensive watershed management plan for Three Mile Creek. The amount of funding is based on the total acreage of the City of Prichard (which accounts for 7.2% of the watershed's total area) and the total \$250,000 cost of this planning effort.

17. General Administration

Provide funds for general program administration.

B. HOME FUNDS

The County anticipates a total of \$462,729 in HOME Funds for the fourth year of the planning period and anticipates \$300,000 in program income. Funds will be used for construction and permanent financing of rental housing for the elderly and construction of up to two single family homes.

HOME FUNDS

Affordable Housing:

| | |
|--|------------|
| Construction and permanent financing of rental housing for the elderly | \$ 500,000 |
| CHDO: Construction of up to two single family homes | \$ 186,457 |
| Program Administration | \$ 46,272 |
| Program Administration from Anticipated Program Income | \$ 30,000 |
| TOTAL HOME BUDGET | \$ 762,729 |

- Priority (HOME)

Construction and Permanent Financing of Special Needs Rental Housing for the Elderly

Mobile County has allocated \$500,000 of HOME funds for the construction of affordable special needs rental housing for the elderly. Funding will be made available to approved developer(s) applying to 2013-2014 Alabama Housing Finance Authority (AHFA) for Low Income Housing Tax Credits (LIHTC). County HOME funds will be available contingent upon the developer/owner receiving an LIHTC award from the State of Alabama. Funding received from the Consortium will be in the form of a loan at 0% interest for a 20-year term. The County has received three proposals from developers that are applying to the AHFA for LIHTC. The first is a \$6.5 million, 48 unit development in the Semmes area. The second is a \$8.2 million, 56 unit development off Cottage Hill and Schillinger Road. The third is also a \$8.2 million, 56 unit development on Dawes Road. AHFA awards only one project per County.

- Priority (CHDO)

Construction of affordable homes for low/mod income households

Mobile County will enter into a CHDO agreement with a designated Community Housing Development Organization (CHDO) to construct up to two (2) new single family housing units. The terms of the agreement will be:

1. Mobile County will provide an indenture in the form of a Future Advance Mortgage.
2. The units will be constructed for eligible low/mod households. These homes may be offered for sale or may be sold through lease/purchase or may be rented.
3. If the units are sold, Mobile County will hold a second mortgage on the unit in order to make the unit affordable. If necessary, the CHDO will hold a third mortgage on the unit in order to make the unit affordable.
4. If the units are sold, funds from the sale of the constructed home(s) less the amount of second mortgage will be considered program income and will be used for other HOME eligible activities.

The County is currently seeking agencies that are interested in becoming a Community Housing Development Organization (CHDO) for Mobile County for participation in the County's Affordable Housing Program.

The Consortium partners with nonprofit organizations, banks, realtors, homebuilders and title companies through its homeownership program by providing down payment assistance and payment of closing costs.

The County will partner with nonprofit organization(s) that have an established framework of communication and outreach to low- and moderate-income persons to

conduct Homebuyer Training classes (funded through CDBG), and to also provide affirmative marketing of the program. These nonprofits will provide Homebuyer Training classes to guide the low-income households through the home buying process. The applicant household must provide documentation that confirms the household income as households with annual incomes of 80% of the current HAMFI or less, and secure private financing in order to become eligible for HOME funds. DPA for homes not constructed with HOME funds, will be limited to first time homebuyers. The maximum amount of assistance per household is limited to \$10,000 while the minimum amount is \$1,000. This assistance will be a secured loan (a recorded second mortgage and a promissory note for the amount of assistance provided) with a zero percent interest rate.

The County provides mortgage assistance which includes DPA and closing cost of up to \$40,000 to eligible homebuyers who purchase homes constructed or rehabbed by developers/homebuilders utilizing HOME funds. There is no first-time homebuyer restriction for homes constructed or rehabbed with HOME funds.

While the County did not include a line item in the 2013 HOME Budget for home inspections, the County will continue providing independent home inspections through the use of funds earmarked in 2010.

While the County did not include a line item in the 2013 HOME Budget for Down Payment Assistance and Closing Cost for Homebuyers, the County will continue to provide down payment assistance through the use of funds earmarked in 2012.

Minority and Women Business Enterprise Outreach: Language in County agreements requires sub-recipients to reach out to minority and women owned businesses. Most procurement for services or construction contracts includes language encouraging minority and women business enterprises to apply. Advertisements are also published or broadcast through minority targeted media.

C. EMERGENCY SOLUTIONS GRANT FUNDS

EMERGENCY SOLUTIONS GRANT

| | |
|---|-----------------|
| Emergency Shelter | \$ 50,000 |
| Homelessness Prevention | \$ 40,000 |
| Homeless Management Information System (HMIS) | \$ 31,980 |
| Administration | <u>\$ 9,890</u> |
| TOTAL ESG BUDGET* | \$ 131,870 |

*See Project Forms

Mobile County plans to sub-grant all of the 2013 ESG funds with shared administration funds to Housing First, Inc., the CoC lead agency, to administer the Mobile County ESG Program. The agreement with Housing First, Inc. as the ESG administration organization will include and obligate full compliance with the ESG regulations and standards as required by the HEARTH Act and the Federal Register release of December 5, 2011.

Mobile County is aware of the HUD goals for further development of the Homeless Management Information System for accountability while addressing, preventing and ending homelessness and for using ESG to continue basic strategies of the Homeless Prevention and Rapid Re-Housing Program.

The CoC system for centralized assessment includes the United Way 2-1-1 call center, a daytime center for the street homeless known as 15 Place and Family Promise of Coastal Alabama for homeless families. The 2-1-1 Call Center provides initial screening and referral for homeless and at-risk individuals and households. 15 Place is an intervention center with case management referral, mental health and addiction treatment specialist, a VA outreach worker, state employment services and access to other resources. The Family Promise program offers telephone assessment, referrals and case management for homeless families with children.

Street outreach services are provided by a HUD SHP grant funded through Housing First, Inc. the CoC lead organization that is based at 15 Place and operated by Franklin Primary Health Center. A HHS PATH grant for outreach to the homeless mentally ill is also based at 15 Place and operated by AltaPointe, Inc.

The growing demand for emergency shelter denotes a need to include 2013 ESG funding in support of organizations that provide that service. The increased need for domestic violence shelter is documented as related to the economic downturn and unemployment around 7.2% in Mobile County. The needs for shelter for single women and families have continued to outpace resources.

The Mobile County 2013 ESG funding will include the following: emergency shelter, homelessness prevention, HMIS, and administration. Housing First, Inc. has served as the Mobile County 2011 and 2012 ESG sub-contract administrative organization and would continue in this role for 2013 ESG. The published homeless definitions and regulations for ESG prevention will apply. Funds will be committed for financial assistance and relocation and stabilization services.

The Homeless Management Information System was enhanced under ESG and HPRP and has become a major accountability activity for reporting the use and impact of resources that target homeless populations. Mobile County will require HMIS participation by all organizations that receive 2013 ESG funding. An exception to this will be domestic violence shelters which should have a comparable database. Funding HMIS will ensure participation and compliance by centralized intake, assessment, and referral organizations using or benefitting from ESG funding for their clients by providing licensure, training, upgraded hardware and software and technical assistance.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Program Year 4 Action Plan General Questions response:

GEOGRAPHIC AREAS OF THE JURISDICTION

During the process of planning the projects and activities for which grant assistance will be provided, the Grantee allows for a procedure of accepting proposals from Consortium member governments, private non-profit agencies, and the public at large. Following an eligibility determination by the Grants Department, a Project Review Committee (consisting of public works officials, legal staff, a consortium municipal association representative, and County administration staff) examine proposals for feasibility, cost effectiveness, and benefit. The Committee ultimately develops and provides a non-binding budget for each formula grant program to the County Commission. The County Commission has the ultimate authority to approve projects and the budget. The goal of this Committee is to address identified needs, geographically distribute funds equitably in accordance with program guidelines, and meet the national objectives of benefitting low and moderate-income persons or aiding in the prevention or elimination of slums and blight.

For those projects designed to benefit low- and moderate-income persons on an area basis, such as various types of public improvements, the budget development process aims at providing assistance in areas of low- and moderate-income as identified in the U.S. Census. In order to benefit low- and moderate-income persons not residing in low/mod tracts, the County will contact HUD to request that a survey be performed to determine income eligibility.

HUD requires 51% of households having a median income of less than 80% of the area median income adjusted for size of household to meet this definition. 2010 Census data was not available for inclusion in this report. The following Census Tracts and Block Groups meet the HUD definition for the 2013 Mobile County Consortium for areas of low and moderate-income concentration:

| CENSUS TRACT | BLOCK GROUP | % LOW/ MOD | CITY / TOWN |
|--------------|-------------|------------|------------------|
| 34.02 | 1 | 87.3% | Prichard |
| 38.00 | 1 | 54.7% | Chickasaw/Creola |
| 39.01 | 1 | 56.9% | Prichard |
| 39.02 | 1 | 77.5% | Prichard |
| 40.00 | 1 | 86.8% | Prichard |
| 40.00 | 2 | 85.1% | Prichard |
| 40.00 | 3 | 65.7% | Prichard |
| 40.00 | 4 | 76.6% | Prichard |
| 41.00 | 1 | 74.2% | Prichard |
| 42.00 | 1 | 79.9% | Prichard |
| 43.00 | 1 | 86.0% | Prichard |
| 43.00 | 2 | 78.2% | Prichard |

| CENSUS TRACT | BLOCK GROUP | % LOW/ MOD | CITY / TOWN |
|--------------|-------------|------------|----------------------|
| 44.00 | 1 | 72.6% | Prichard |
| 44.00 | 2 | 70.1% | Prichard |
| 45.00 | 1 | 71.1% | Prichard |
| 46.00 | 1 | 73.0% | Prichard |
| 46.00 | 2 | 83.4% | Prichard |
| 47.00 | 1 | 85.1% | Prichard |
| 47.00 | 2 | 62.1% | Prichard |
| 48.00 | 1 | 94.8% | Prichard |
| 48.00 | 2 | 77.7% | Prichard |
| 48.00 | 3 | 65.1% | Prichard |
| 49.00 | 1 | 70.0% | Prichard |
| 49.00 | 2 | 56.5% | Prichard |
| 49.00 | 3 | 84.4% | Prichard |
| 49.00 | 4 | 67.1% | Prichard |
| 51.00 | 1 | 58.9% | Chickasaw |
| 51.00 | 2 | 52.7% | Chickasaw |
| 52.00 | 2 | 51.6% | Chickasaw |
| 58.00 | 1 | 63.4% | |
| 58.00 | 3 | 74.5% | |
| 61.03 | 2 | 51.1% | Prichard |
| 64.02 | 2 | 63.8% | |
| 64.03 | 1 | 64.8% | |
| 64.05 | 2 | 54.0% | |
| 67.00 | 1 | 57.9% | |
| 67.00 | 3 | 56.0% | |
| 67.00 | 4 | 52.1% | |
| 68.02 | 1 | 53.8% | Tillmans Corner CDP |
| 69.01 | 2 | 56.5% | Tillmans Corner CDP |
| 71.02 | 1 | 62.6% | Theodore CDP |
| 73.00 | 1 | 60.3% | Bayou La Batre/Coden |
| 73.00 | 2 | 57.5% | Bayou La Batre/Coden |
| 73.00 | 4 | 60.1% | Bayou La Batre/Coden |

HUD Summary Census 2012

Often, but not always, areas containing a concentration of low/moderate-income households will also be areas of racial or ethnic minority concentrations. 2010 Census data was not available for inclusion in this report. Based upon Census 2000 data, the geographic areas of the jurisdiction that contain racial/minority concentrations are identified as follows:

| CENSUS TRACT | BLOCK GROUP | % LOW / MOD | % MINORITY |
|--------------|-------------|-------------|------------|
| 34.02 | 1 | 87.3% | 62.9% |
| 39.01 | 1 | 56.9% | 95.5% |
| 39.02 | 1 | 77.5% | 86.2% |
| 40.00 | 1 | 86.8% | 100.0% |
| 40.00 | 2 | 85.1% | 98.5% |
| 40.00 | 3 | 65.7% | 97.5% |
| 40.00 | 4 | 76.6% | 98.0% |
| 41.00 | 1 | 74.2% | 99.6% |
| 42.00 | 1 | 79.9% | 100.0% |

| CENSUS TRACT | BLOCK GROUP | % LOW / MOD | % MINORITY |
|--------------|-------------|-------------|------------|
| 43.00 | 1 | 86.0% | 100.0% |
| 43.00 | 2 | 78.2% | 100.0% |
| 44.00 | 1 | 72.6% | 99.1% |
| 44.00 | 2 | 70.1% | 100.0% |
| 45.00 | 1 | 71.1% | 93.6% |
| 46.00 | 1 | 73.0% | 99.0% |
| 46.00 | 2 | 83.4% | 100.0% |
| 47.00 | 1 | 85.1% | 87.3% |
| 47.00 | 2 | 62.1% | 95.0% |
| 48.00 | 1 | 94.8% | 94.7% |
| 48.00 | 2 | 77.7% | 91.2% |
| 48.00 | 3 | 65.1% | 100.0% |
| 49.00 | 1 | 70.0% | 77.9% |
| 49.00 | 2 | 56.5% | 91.3% |
| 49.00 | 3 | 84.4% | 96.6% |
| 49.00 | 4 | 67.1% | 96.9% |
| 58.00 | 1 | 63.4% | 52.4% |
| 58.00 | 2 | 51.2% | 78.3% |
| 58.00 | 3 | 74.5% | 94.6% |
| 61.03 | 2 | 51.1% | 53.8% |
| 71.02 | 1 | 62.6% | 57.9% |

HUD Summary Census 2012 & US Census Bureau - Census 2000 Summary File 3 Table P6. Race

The jurisdiction does not anticipate dedicating target areas at this time.

BASIS FOR ALLOCATING INVESTMENTS GEOGRAPHICALLY WITHIN THE JURISDICTION

Mobile County Commission allocates investments geographically within the jurisdiction based on four determining factors. PY2013 is no exception. The four factors include: (1) the geographic areas of the jurisdiction targeted for grant assistance as identified above; (2) the assigned priority of needs it has documented in the needs tables; (3) the advisory input from the citizens through the citizens participation process and (4) the "local objectives" defined for the Mobile County Consortium which are listed as follows:

1. Housing and neighborhood preservation, including new housing opportunities principally for low and moderate-income households;
2. Economic development through job retention or creation to benefit low and moderate-income individuals;
3. Public improvements and facilities limited to the support of the first two objectives;
4. Elimination of blight and blighting elements that support the first two objectives;
5. Programs offering significant community benefit in direct support of the first two objectives, including a cost-to-benefit determination; and
6. Capacity of the project to be sustained over the long term (e.g., future maintenance and upkeep).

Reasons for the allocation priorities, the geographic areas of the jurisdiction in which it will direct assistance, and the obstacles to addressing underserved needs are discussed in the Consolidated Plan (2010-2014), as amended.

PY2013 ACTIONS TO ADDRESS OBSTACLES TO MEETING UNDERSERVED NEEDS

The Action Plan brings into place several elements that will mitigate the identified barriers to Affordable Housing. Down payment assistance, payment of closing costs, and mortgage assistance will remove an economic barrier to affordable housing. The construction of new or improvements to existing public infrastructure will facilitate development of residential building sites without adding significantly to the development costs passed on to the homebuyers. The construction of single family homes and elderly rental housing will contribute directly to the supply of affordable housing within the planning area.

OTHER FEDERAL, STATE AND LOCAL RESOURCES

Other resources, such as additional Section 8/Housing Choice Vouchers, could be made available to one or more of the local public housing authorities. However, since these are unknowns over which the jurisdiction has no control, no goals have been set. The same applies to competitive HEARTH Act Funds received by the local CoC and local homeless service providers.

As explained under the heading of "Homelessness," Housing First, Inc. is the lead agency in a multi-jurisdictional and multi-agency effort to address homelessness. The Consortium will provide a letter of consistency for the CoC to apply for grant funds. The Consortium will provide ESG funds and other funds that may from time to time come available to the CoC and/or its collaborating service providers. The County plans to enter into a non-competitive sub-recipient agreement with Housing First to administer the Emergency Solutions Grant program. Through this structure the Consortium will carry out its homelessness strategy.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
 2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
 3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.
- Program Year 4 Action Plan Managing the Process response:

Mobile County Commission is the lead agency that oversees the development of the plan and for administering programs covered by the Consolidated Plan and the Annual Action Plan. Mobile County Commission is also the major public agency.

Since the Consortium follows a project selection procedure that requires proposals from member jurisdictions and other public and private agencies to be submitted on an annual basis, public and private agencies (such as housing authorities and non-profits) change from year-to-year and activity-to-activity depending upon the nature of the proposed activities and the funds available.

Mobile County Commission, through its Grants Department, has the responsibility for coordinating the implementation of the Consolidated Plan and Annual Action Plan. This is accomplished through the use of in-house staff, coordination with other governmental, private and non-profit agencies with similar interests and missions.

In addition to the Consortium, the major public and private agencies responsible for administering programs in PY2013 covered by the Consolidated Plan include, but are not limited to the following: Family Counseling Center of Mobile dba Consumer Credit Counseling of Mobile County and The Rape Crisis Center of Mobile; The Child Advocacy Center, Inc.; Housing First, Inc.; Independent Living Center of Mobile; Penelope House Family Violence Center, Inc.; The Bridge, Inc.; Semmes Woman's Club; Boys and Girls Clubs of South Alabama, Inc.; and Ozanam Charitable Pharmacy, Inc. Other entities may be added to this list during the year should conditions warrant.

The Grants Department staff of the Mobile County Commission was charged with development of the Annual Action Plan and the Consolidated Plan. The County met with various public and private agencies in order to garner available knowledge of the needs and opportunities facing the community, and organizing and conducting public and governmental involvement meetings. All citizens of the community, especially low- and moderate-income citizens, are provided adequate opportunity to participate in the planning process in an advisory role in accordance with the Citizens Participation Plan. The Planning Review Committee followed the priority needs identified in the Consolidated Plan. The Planning Review Committee comprised of representatives from Mobile County, the municipalities, the health and social services agencies, and the citizens served in the Urban County.

Mobile County consulted with: all member municipalities in the Urban County Consortium; the Prichard, Chickasaw, and Mobile County Housing Authorities; Habitat for Humanity; South Alabama Regional Planning Commission (SARPC); Ozanam Charitable Pharmacy; the Child Advocacy Center; Housing First, Inc.; the Independent Living Center of Mobile; Alabama Department of Public Health; and Consumer Credit Counseling of Mobile. SARPC prepared a study that identified barriers to affordable housing in Mobile County. In the process of preparing the study, SARPC gathered information from a large number of local service providers, such as homeless service agencies, banks, legal services, housing authorities, agencies that serve individuals with disabilities, and fair housing agencies. This information was provided to the County for use in development of the Consolidated and Action Plans.

The County will continue to meet with the public and private housing, health and social service agencies during the year in order to enhance coordination between all the agencies so that a good exchange of information can occur among these agencies.

Citizen Participation

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 4 Action Plan Citizen Participation response:

In the process of compiling and developing the Consolidated Plan and Action Plan numerous forms of public input were solicited. Various state and federal agencies, chief elected officials, nonprofit organizations, professional technicians, and citizens at large were contacted concerning the Plans. The Consolidated Plan and Action Plan process have specific citizen participation requirements set forth in a Citizen Participation Plan adopted by the Mobile County Commission in 2002.

The Citizen Participation Plan requires that a public hearing is held at the beginning of the planning stage and prior to public comment and that the plan then be available for citizen review for thirty days prior to submission to HUD. Public hearings were held on November 13, 2012 to solicit citizen comments on housing and community development issues and to explain the application process. The Notice of Public Hearings was published in the Mobile Register (which is published in Mobile County and is one of the largest newspapers in the state) and 2 smaller local newspapers, and on the County's website. Additionally, translation was available upon request for Spanish-speaking residents.

Public hearing locations are fully handicapped accessible. A public hearing was held on March 8th prior to the public comment period. A public hearing will be held on April 9th prior to adoption and submission of the Action Plan to HUD to encourage citizen participation.

Proposals were accepted through December 17, 2012. A display advertisement was published in the Mobile Register on February 27, 2013 that provided notice of the March 8th and April 9th public hearings and the comment period. A summary of the Action Plan was published on March 8, 2013. The March 8th publication established the beginning of a 30-day comment period that ends on April 8, 2013.

The Action Plan is available for review at all the Consortium member city halls and at various libraries located throughout the County and at the County Commission as well as on the County's website. A Spanish translation Action Plan is available on the website and upon request.

4. Not applicable

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Program Year 4 Action Plan Institutional Structure response:

The Mobile County Program is a Consortium of nine municipalities and the Mobile County Commission. The Town of Dauphin Island elected to withdraw from the Consortium in 2008.

HUD has designated Mobile County and the nine member municipalities as an Urban County. The Mobile County Commission is the lead agency. The nine-member municipalities are as follows:

- City of Bayou La Batre
- City of Chickasaw
- City of Citronelle
- City of Creola
- Town of Mount Vernon
- City of Prichard
- City of Saraland
- City of Satsuma
- City of Semmes

The City of Mobile is a separate entitlement and not part of the Consortium.

Mobile County Commission, through its Grants Department, has the responsibility for coordinating the implementation of the Consolidated Plan and Annual Action Plan. This is accomplished through the use of in-house staff, coordination with other governmental, private and non-profit agencies with similar interests and missions. In addition to the Consortium, the major public and private agencies responsible for administering programs covered by the Consolidated Plan include, but are not limited to the following:

- Family Counseling Center of Mobile, Inc. dba Consumer Credit Counseling of Mobile and Rape Crisis Center
- Child Advocacy Center, Inc.
- Independent Living Center of Mobile
- Ozanam Charitable Pharmacy, Inc.
- Penelope House Family Violence Center, Inc.
- Semmes Woman's Club, Inc.
- The Bridge, Inc.
- Boys and Girls Clubs of South Alabama, Inc.
- Housing First, Inc.

Other entities may be added to this list over the year should conditions warrant.

Management responsibility (assigned to the Grants Department) is in-house and in one place; In-house cost evaluation of projects; Interdepartmental and interdisciplinary relationships established; Strong Environmental Department; In-house Legal Department; In-house Grants Department and In-house project management staff in County Engineering Department. In addition, a system for soliciting and evaluating project or activity requests has been instituted with emphasis on meeting project eligibility requirements and on addressing priority needs as well as strategic plan goals and objectives.

The County will continue to seek roundtable discussion meetings with other governmental groups or agencies, financial institutions, public housing agencies and private and nonprofit agencies with similar interests and missions. These meetings enable organizations that share common goals a venue to exchange information.

This process creates a mechanism that identifies gaps in service delivery so that planning can be initiated to address the needs gap.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 4 Action Plan Monitoring response:

The County recognizes its responsibility to ensure that all Community Development Block Grant, Emergency Solutions Grant, and HOME activities fully comply with all federal, state and local regulations. The County will monitor all funds obligated and spent, whether spent directly, through a contract or a sub-recipient agreement to ensure compliance with the federal regulations.

The County will procure, manage and review all public works projects to be undertaken with CDBG funds. Construction contracts will be secured through the competitive bid process. All sub-recipient agreements and contracts for professional services or for construction will be procured in accordance with the appropriate portion of 24 CFR part 85.36 and any other procurement regulations that may apply. Sub-recipient agreements will fully comply with all applicable regulations as stipulated in 24 CFR 570.200, 570.500 and 570.502-504. The County will secure appropriate services necessary to implement the goals and objectives as stated in this Action Plan and to ensure all proposed activities are in compliance with the Consolidated Plan.

The County will provide oversight and guidance to organizations with public facilities construction projects to be undertaken with CDBG funds to ensure compliance with federal regulations.

A Project Review Committee composed of Mobile County administration, legal, engineering, environmental and a member of the Municipal Association review proposed CDBG projects submitted for funding to determine project feasibility. Project eligibility is determined by the Grants Department based upon the type of activity and national threshold requirements. All projects for the HOME and CDBG programs (with the exception of limited clientele activities) shall principally benefit low- and moderate-income persons (<80% HAMFI). This documentation will be provided in a form that is acceptable to HUD. All applicants for HOME funds will be properly screened to determine household income levels using the part 5 Section 8 income determinations. Only those persons with household incomes of <80% HAMFI who satisfy the other program requirements will be allowed to participate.

The County will conduct an annual review of each down payment and mortgage assistance participating household to secure evidence of the purchasing household's continued occupancy. This review will occur at twelve-month intervals beginning 12 months from the original date of occupancy. Households who occupy a home constructed by a CHDO will be monitored similarly.

A periodic review will be made of each grant to ensure the timeliness of expenditure and also that the goals and objectives are in compliance with the Consolidated Plan and Action Plan.

Mobile County will be responsible for monitoring ESG activities carried out by sub-recipient, Housing First, as established by HUD as well as any subsequent guidance. The County will utilize a variety of contractual, financial, reporting and monitoring controls, in combination with outcome/performance measures, to ensure prompt and proper use of ESG funds in accordance with the program regulations. The County will perform on-site monitoring of Housing First, Inc. on an annual basis to ensure compliance by the sub-recipient. Following the monitoring visit, a letter will be sent to the sub-recipient recapitulating the visit. If in compliance with the regulations, it will be reflected in the letter. If not in compliance, the letter will include recommendations to bring them into full compliance. Housing First will monitor all additional ESG sub-recipients. Should problems arise, frequency will be increased until issues are resolved, reported and approved by County.

Financial Management - The County requires Sub-Recipients documentation to include as a minimum the following:

Use of Funds

Required match funds (origin and expenditures, if applicable)

Budget controls

Cash management procedures

Procurement

Property asset controls

Audits

In order to ensure that funds are drawn in compliance with cash management regulations, the County draws all funds from the Treasury.

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 4 Action Plan Lead-based Paint response:

The County will continue to require a lead evaluation on any dwelling unit that receives HOME funding. A visual assessment of the unit must be conducted to identify any deteriorated paint, dust, debris and residue, so that these conditions can be corrected prior to closing. The property owner must correct any conditions identified in the visual assessment and all deteriorated paint must be stabilized by properly trained or supervised workers using lead safe work practices. Homebuyers receive the Lead Hazard Information Pamphlet, Lead Disclosure Notice, and the Notice of Lead Reduction.

Housing First, Inc. as the sub-recipient organization for Mobile County ESG administration has established procedures for determining the status of lead-based paint risks for all housing units being considered for HUD ESG funding. All housing units being considered for ESG payments will be inspected or otherwise determined lead-free by Housing First, Inc. Housing built before 1978 would require a site inspection and a record of compliance by the rental agency or landlord. Housing for households with children under six or with pregnant females will require full and exact documentation that lead-based paint is absent.

All expenditures of HUD funds (CDBG, HOME, and ESG) will fully comply with all applicable lead-based paint regulations.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 4 Action Plan Specific Objectives response:

The emphasis for the need for affordable housing for low- and moderate-income households within the County remains a priority for the Consortium. The County will provide homebuyer counseling accompanied by financial assistance to purchase a home. The County will provide homebuyer counseling through the use of CDBG funds and down payment assistance and closing costs as well as mortgage assistance through the use of HOME funds.

Additionally, an increase in the stock of affordable housing will be made available through the construction of rental housing for the elderly by a developer and the construction of up to two (2) single family homes by a Community Housing Development Organization (CHDO).

Refer to pages 10-11.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 4 Action Plan Public Housing Strategy response:

The County provides encouragement to public housing residents to attend the Homebuyer Training Classes by offering these classes at several locations. These classes can become a springboard for residents to attend credit counseling, if they would like to participate in the Down Payment Assistance program but bad credit prevents them from securing a first mortgage. The County will encourage and support efforts of public housing residents to participate in credit counseling with the goal of becoming a future homeowner. The County has formed partnerships with nonprofit organizations to increase Fair Housing activities that public housing

residents wish to undertake. All public housing residents have equal opportunity to benefit from housing assistance as well as public services. No specific actions are proposed in 2013 to address the identified needs of public housing or fund housing improvements and/or resident initiatives.

There are four housing authorities in Mobile County: Mobile County Housing Authority, Chickasaw Housing Authority, Bayou La Batre Housing Authority, and Prichard Housing Authority. There are no public housing agencies in the Consortium jurisdiction designated by HUD as a troubled agency.

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 4 Action Plan Barriers to Affordable Housing response:

The County provides Homebuyer Training Classes to low- and moderate-income persons to prepare them for understanding the processes and responsibilities of homeownership. The County uses HOME funds to provide assistance to qualified low- and moderate-income homebuyers to pay down payments and eligible closing costs. The County also provides mortgage assistance to homebuyers who purchase homes constructed with County HOME funds.

The County will provide funds for construction and permanent financing of rental housing for the elderly and construction of up to two (2) single family homes for low and moderate income households. The County has allocated more than the required 15 percent of HOME funds for a qualified Community Housing Development Organization to construct up to two (2) single family homes.

The County will provide CDBG funding to a local nonprofit to provide home modifications for the removal of architectural barriers in dwelling units occupied by persons with disabilities. The County will support the applications of qualified housing organizations for discretionary HUD housing programs such as Section 202/811 by providing Certificates of Consistency where appropriate to support and increase affordable housing units.

Minority and Women Business Enterprise Outreach: Language in County agreements requires sub-recipients to reach out to minority and women owned businesses. Most procurement for services or construction contracts includes language encouraging minority and women business enterprises to apply. Advertisements are also published or broadcast through minority targeted media.

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).
2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
 - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
 - a. Describe the planned use of the ADDI funds.
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
 - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Program Year 4 Action Plan HOME/ADDI response:

1. There are no other forms of investment not described in § 92.205(b).
2. The Consortium uses the provisions of 24 CFR 92.254 (a)(5)(ii)(2) and (4). Recapture net of proceeds; Owner investment returned first. In the event of a voluntary or involuntary transfer of the purchased home during the applicable period of affordability, the County will recapture all or a portion of the direct subsidy provided to the homebuyer.

Direct subsidy is the amount of HOME assistance that enabled the homebuyer to buy the home. It includes down payment assistance, closing costs and any assistance needed to enable the homebuyer to purchase the home at an affordable price. If HOME funds were used for the cost of developing a home which is sold below fair market value, direct subsidy also includes the difference between the fair market value and the purchase price.

Direct subsidy will be in the form of a deferred loan or loans, each secured by a promissory note and mortgage. The loan(s) will be forgiven pro rata, in equal monthly increments over the period of affordability, as set out in the promissory note(s), mortgage(s) and required HOME written agreement(s) (collectively, the loan documents) as long as the home remains the principal residence of the homebuyer and no other events of default, as are also set out in the loan documents occur.

The HOME program establishes the following period of affordability based upon the amount of assistance (direct subsidy) provided to the homebuyer:

- Direct subsidy of Under \$15,000 will be forgiven in equal amounts on a monthly basis over a period of 5 years
- Direct subsidy of \$15,000-\$40,000 will be forgiven in equal amounts on a monthly basis over a period of 10 years
- Direct Subsidy of Over \$40,000 will be forgiven in equal amounts on a monthly basis over a period of 15 years

If there are no net proceeds from the voluntary or involuntary transfer, repayment is not required and HOME requirements are considered to be satisfied. The term net proceeds is defined as sales price less payment of any superior loan and special liens due there under; expenses of sale; and the value of the homebuyer's equity in the purchased home.

3. The County does not intend to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds.

4. ADDI funds will not be received.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.
2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.
4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Program Year 4 Action Plan Special Needs response:

At the time of publication of this Action Plan, HUD has not released the Approved SHP Grant amounts or the 2013 HUD Jurisdictional Pro Rata Percentages. The following Table reflects grant applications that were submitted from this area.

**2013 HUD Grants Request
City & County of Mobile, Baldwin County
Continuum of Care AL501**

| Tier 1 | Agency / Sponsor | Project | Amount |
|-------------------------|---|--|------------------|
| 1 | AltaPointe Health Systems | Chronic Permanent Housing | 378,487 |
| 2 | Loaves and Fish Community Ministries | 15 Place Day Center | 417,636 |
| 3 | Penelope House | TLC Transitional Housing Families | 148,977 |
| 4 | Dumas Wesley Community Center | Family Village Transitional Housing | 166,183 |
| 5 | Housing First, Inc. | Victory Permanent Housing Disabled | 163,071 |
| 6 | Family Promise | Case Management Families | 79,667 |
| 7 | Catholic Social Services Baldwin | Permanent Housing Disabled | 125,439 |
| 8 | St. Mary's Home | Transitional Housing Young Adults | 151,565 |
| 9 | Baldwin Family Violence Shelter | DV Transitional Housing | 105,732 |
| 10 | The Salvation Army | Project Able | 96,561 |
| 11 | Service Center Catholic Social Services | Permanent Housing Disabled | 178,401 |
| 12 | Housing First, Inc. | Victory Transitional Housing Families | 92,008 |
| 13 | Housing First, Inc. | Community Housing Program | 611,562 |
| 14 | Franklin Primary Health Center | Franklin Case Management | 87,740 |
| 15 | Housing First, Inc. | Homeless Management Information System | 107,000 |
| 16 | Housing First, Inc. | Gateway II | 123,163 |
| 17 | Housing First, Inc. | Gateway III | 124,521 |
| 18 | AltaPointe Health Systems | Shelter Plus Care | 266,519 |
| Sub-Total Tier 1 | | | 3,424,232 |
| Tier 2 | | | |
| 19 | Housing First, Inc. | Alabama Housing Network AL-501 | 125,404 |
| 20 | Housing First, Inc. | Planning & Activities AL-501 | 44,370 |
| 21 | AIDS-Alabama | Cornerstone Project | 254,878 |
| Sub-Total Tier 2 | | | 424,652 |

2013 HUD Application Request \$3,848,884

Other federal grants available to Mobile County for addressing, preventing and ending homelessness are:

Housing First, Inc.: Health & Human Services

SAMHSA Act Team grant for Chronic Homeless \$400,000 annually

This grant provides intensive case management and treatment services for helping the chronic homeless secure and retain housing.

Housing First, Inc.: Veterans Affairs

Supportive Services for Veteran Families Program \$660,000 annually

This grant is geared to preventing homelessness for veterans and their families.

In 2012, Housing First, Inc. applied for and received \$400,000 in ESG funds from the State of Alabama. Of the \$400,000 \$280,000 will be available for use in Mobile County, \$120,000 in Baldwin County, and \$69,222 in the City of Mobile. Housing First plans to apply for state ESG funds in 2013.

The needs of the homeless will be addressed directly and indirectly through the accomplishments of the specific activities planned for this year. Mobile County intends to respond to the full range of needs of the homeless. The County has formed partnerships with nonprofit agencies and organizations that provide outreach and assistance to individuals and families that are at risk of becoming homeless. The County provides financial support with CDBG and the County's General fund to support Penelope House Family Violence Center, an agency that provides services for abused women and their children. The County provides financial support with ESG and the County's General fund to support Housing First, Inc. the lead agency for Continuum of Care and a multi-service, multi-agency provider for the homeless. The County provides financial support with CDBG for Legal Services Alabama for a Homeless Prevention Project. The County will provide funding for the Homeless Management Information System (HMIS) from the County's ESG Program. HMIS is a program that collects demographic information that the federal government requires in tracking the homeless population.

Housing First, Inc. has accepted responsibility for coordinating and encouraging discharge planning to prevent homelessness when individuals are being released from a penal facility, hospital, institution or program that has responsibility for such planning. There are formal protocols in place for health care and mental health institutions that includes an annual letter from Housing First, Inc. to re-new and confirm agreements. Protocol for corrections is under development by the Mobile Area Interfaith Conference and includes plans for a community release center. The State of Alabama Department of Human Resources has a formal and written protocol for preventing homelessness when a youth has aged-out of foster care or from substitute care but limited resources have prevented full implementation. A HUD funded transitional housing project through Housing First, Inc., the lead CoC agency, is available to these youth at St. Mary's Home, either at the time of discharge or after becoming homeless, targeting those who are ages 19-24.

In 2013, the County anticipates receiving \$131,870 in ESG funds. Mobile County has met with Housing First, Inc., the Continuum of Care lead organization, and plans to enter into a non-competitive sub-recipient agreement for managing a competitive process and executing sub-recipient agreements for eligible organizations selected for ESG activities that address the needs of the homeless in Mobile County.

Housing First, Inc. has gained substantial experience by successfully administering the Mobile County Emergency Solutions Grant, the City of Mobile's Emergency Solutions Grant and the State of Alabama's Emergency Solutions Grant. They also have experience as a HUD SHP grantee and as a sub-grantee for local HUD funds. Housing First, Inc. operates the jurisdictional Homeless Management Information System (HMIS) and manages permanent and transitional housing projects. Based on their prior successes working with ESG and other homeless programs, Housing First, Inc. has the capacity to administer the Mobile County Emergency Solutions Grant Program in an effective manner.

Upon HUD approval of the 2013 Action Plan, Mobile County Commission would proceed with the sub-recipient agreement with Housing First, Inc. to create the structure and process required for HMIS, the clearinghouse for clients served, the ESG services to target, and the capacity for financial management of ESG funds.

The match requirement will be met by the sub-recipient Housing First, Inc. and all additional ESG sub-recipients as set forth in 24 CFR 576.201. Match will be cash and in-kind. Match sources will include the following: cash match by referring agency/church and HUD SHP grant, and in-kind match by referring agency staff time, and sub-recipient staff time.

The needs of the homeless will be addressed directly and indirectly through the accomplishments of the specific activities planned for this year. Mobile County intends to respond to the full range of needs of the homeless.

Emergency Shelter

The growing demand for emergency shelter denotes a need to include 2013 ESG funding in support of organizations that provide that service. The increased need for domestic violence shelter is documented as related to the economic downturn and unemployment around 7.2% in Mobile County. The needs for shelter for single women and families have continued to outpace resources.

Homelessness Prevention

The Consortium supports HUD's national goal of ending homelessness. In this regard, the Consortium focuses on programs and activities targeted at assisting persons at imminent risk of becoming homeless, thereby preventing homelessness as well as those defined as homeless. The 2013 ESG funds will provide assistance for homelessness prevention.

HMIS

The Homeless Management Information System was enhanced under HPRP and became a major accountability activity for reporting the use and impact of resources that target homeless populations. Mobile County will require HMIS participation by all organizations that receive 2013 ESG funding with the exception of domestic violence shelters, which are exempt under federal law. Funding HMIS will ensure participation and compliance by centralized intake, assessment, and referral organizations using or benefitting from ESG funding for their clients by providing licensure, training, upgraded hardware and software and technical assistance.

ESG funds are allocated in 2013 for the following activities:

- Emergency Shelter,
- Homelessness Prevention – Tenant Based Rental Assistance,

- Homelessness Prevention – Housing Relocation and Stabilization Services,
- HMIS, and
- Administration.

Housing First, Inc. would extend sub-recipient agreements to established organizations for ESG activities. An announcement and application would be distributed to eligible CoC organizations that participate in HMIS or will agree to participate. An exception to this will be domestic violence shelters with a comparable database. A review committee with representation from the CoC board of directors would make recommendations to the Mobile County Commission regarding the suitability and capacities of sub-recipient applicants. The Mobile County Commission would approve the sub-recipient organizations and authorize Housing First, Inc. to execute sub-recipient contracts.

The Mobile County 2013 ESG funding will include the following: emergency shelter, homelessness prevention, HMIS, and administration. Housing First, Inc. has served as the Mobile County 2011 and 2012 ESG sub-contract administrative organization and would continue in this role for 2013 ESG. The published homeless definitions and regulations for ESG prevention will apply. Funds will be committed for financial assistance and relocation and stabilization services.

A competitive application process will be carried out by Housing First, Inc. for ESG service providers for Emergency Shelter and Prevention activities.

Emergency Shelter:

A competitive application process will be carried out by Housing First, Inc. Projections are to be determined.

Homelessness Prevention – Tenant Based Rental Assistance:

An estimated 20 at-risk households will receive rental assistance averaging \$1,000 each to prevent homelessness over the two year funding term.

Homelessness Prevention – Housing Relocation and Stabilization Services:

An estimated 20 at-risk households will receive housing stability case management and housing search and placement services to prevent homelessness over the two year funding term.

HMIS:

Funding will be provided for HMIS for licensure, training, upgraded hardware and software and technical assistance. This allocation of ESG funding is intended to provide some capacity for continuing assistance and addressing the increased usage and demands for HMIS as required by the HEARTH Act. To meet the minimum standards for HMIS, organizations that serve the homeless but do not receive federal funding need to participate and assist with a database that would include all homeless populations being served. The ESG funds will be used to encourage broad community participation in HMIS. Both shelter organizations and service provider organizations as well as the homeless population will benefit from this allocation. There are approximately 4,200 homeless individuals currently entered into HMIS who will benefit from greater access to available services and housing resources. As agency participation increases the number entered will increase.

Organizations working with the homeless will increase HMIS participation by 10% over the two year funding term.

Administration

Administration will be shared with sub-recipient Housing First, Inc. No goals are required for Administration. None have been established.

The following are projected accomplishments, in accordance with each indicator, to be made within one year:

Performance Indicator - At-risk households will receive rental assistance and case management services to prevent homelessness.

- 10 At-risk households will receive rental assistance averaging \$1,000 each and 10 at-risk households will have access to housing stability case management and housing search and placement services to prevent homelessness.

Performance Indicator - HMIS participation by organizations serving the homeless will increase.

- Organizations serving the homeless will increase HMIS participation by 5%.

The following are projected accomplishments, in accordance with each performance indicator, to be made over the period for which the grant will be used for that activity:

Performance Indicator - At-risk households will receive rental assistance and relocation/stabilization services to prevent homelessness.

- 20 At-risk households will receive rental assistance averaging \$1,000 each and 20 at-risk households will have access to housing stability case management and housing search and placement services to prevent homelessness.

Performance Indicator - HMIS participation by organizations serving the homeless will increase.

- The HMIS database required by HUD will be expanded and more complete. Organizations serving the homeless will increase HMIS participation by 10%.

WRITTEN STANDARDS FOR PROVISION OF ESG ASSISTANCE

From the Interim Rule, recipients, other than states, may carry out all eligible activities by sub-grant to private nonprofit organizations. Based on the successful implementation of ESG and HPRP by Housing First, Inc., the County will sub-grant funds to Housing First, Inc. to carry out ESG activities for 2013 Emergency Solutions Grant allocations.

Standard policies and procedures for administering and evaluating ESG as well as participant standards are being further developed in a plan for implementation by Housing First, Inc. subject to approval by Mobile County. Standards will include the following:

Standards for Administering and Evaluating ESG

1. An ESG program must be aligned and coordinated with the CoC goals for reducing/ending homelessness.
2. A homeless individual or formerly homeless individual must participate in the development of an ESG program.
3. Use of the centralized intake process will be mandated upon completion of the centralized intake system.
4. Participants receiving prevention must meet with a case manager monthly and there must be a case plan for obtaining/retaining permanent housing.
5. There must be a formal process for terminating assistance.
6. Shelters must meet minimum habitability standards.
7. The use of HUD funds for housing assistance requires that habitability, rent reasonableness and fair market rent, and lead paint standards are met.
8. There must be no conflicts of interest issues with the referral process or for determining eligibility and the delivery of assistance for participant households.

The standards in the ESG policies and procedures for prevention and re-housing will be modified to reflect more limited eligibility based on funding availability, if necessary.

Initial Standards will include the following:

- a. *Eligibility:*
Shelter – Admissions are for individuals and families who are homeless according to the federal definitions.
Prevention – Households determined at imminent risk of becoming homeless through an application process that documents status, AMI below 30% and less than adequate other resources that would prevent homelessness.
- b. *Coordination among providers and mainstream resources:*
ESG assistance will be provided based on the “But For” principal that determines that no other resources are available or must be used first prior to ESG, and must be coordinated with other resources.
- c. *Determination of need for Prevention:*
The determination as to needing prevention will be assessed based on immediate circumstances and potential for resolution with ESG participation. Households at-risk but currently housed will be considered for ESG Prevention assistance.
- d. *Shared costs for participants:*
To increase the number of households receiving ESG prevention assistance, participant households will be routinely expected to provide/generate 25% of financial assistance needed unless circumstances clearly justify otherwise. Extended family, referring agencies and churches will be asked to participate in meeting this objective.
- e. *Length of assistance:*
Rental assistance only will be available for prevention. A maximum of 6 months assistance will be available, including arrears.

f. Determining type, amount and duration of assistance:

Prevention rental assistance will be determined based upon sections "a-c".

The amount of the assistance and the duration will be determined as indicated under sections "d and e" above.

HMIS policies and procedures are required to meet strict HUD standards and guidelines. The CoC board has a HMIS committee and HMIS policies and procedures have been in place since 2004 with annual updates in cooperation with the state-wide PromisAL HMIS system.

The 2013 CoC Chart of Homeless Services available in Mobile County and the 2013 Goals and Strategies for addressing and preventing homelessness provided by Housing First, Inc. are included in the Appendix.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Program Year 4 Action Plan ESG response:

Not applicable.

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.
2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 4 Action Plan Community Development response:

Please refer to the response to the Community Development Needs Table and the Community Development Plan regarding Non-Housing Community Development Needs in the 2010-14 Five-Year Consolidated Plan. Please also refer to the Executive Summary and Project forms of this Action Plan.

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 4 Action Plan Antipoverty Strategy response:

Specific elements of this Action Plan will effectively reduce the number of poverty level families through the proposed activities to be undertaken with CDBG and HOME funds yearly. Housing construction projects funded through the HOME program will result in the creation of jobs. The County will work with nonprofit organizations to identify qualified low-income households to participate in the down payment assistance programs for the homebuyers. Becoming a homeowner will enable some low-income households who have carried an excessive housing cost burden to realize an increase in disposable income thus raising those households up from the poverty level. The planned infrastructure improvements will create entry-level construction jobs that will provide an economic stimulus and benefits for the low- and moderate-income neighborhoods. The County will focus on the elimination of homelessness and the impact of supportive services to low-income households to reduce the number of persons living in poverty.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 4 Action Plan Specific Objectives response:

The County has partnered with a local nonprofit, Independent Living Center of Mobile, which specializes in providing services to persons with disabilities, to carry out a home modification program in the County. Up to 5 persons with disabilities should benefit from this program this year.

The County has partnered with a local nonprofit, Mobile Arc, to renovate a kitchen and make accessibility improvements at a group home for adult individuals with developmental disabilities. Up to 7 group home residents should benefit from this project this year.

The County is funding an elderly rental housing project in 2013.

The County is not funding any frail elderly, persons with disabilities, HIV/AIDS, alcohol or other substance abuse housing projects in 2013.

Housing Opportunities for People with AIDS

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for

achieving housing stability, reduced risks of homelessness and improved access to care.

5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.
7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 4 Action Plan HOPWA response:

Not applicable.

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 4 Specific HOPWA Objectives response:

Not applicable.

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

PLAN TO AFFIRMATIVELY FURTHER FAIR HOUSING

It is the policy of Mobile County to comply fully with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a).

The County 1) will take steps to overcome the effects of impediments to fair housing choice that were identified in the County's Analysis of Impediments to Fair Housing Choice; 2) will refer to fair housing agencies for remedy of discrimination in housing; and 3) will promote fair housing choice.

The County will take steps to affirmatively further fair housing in its HOME Program. The steps will include:

- Market the HOME program to all eligible persons, including persons with disabilities and persons with limited English proficiency. Marketing may include newspapers, billboards, television, radio stations, posters, brochures, website, and flyers;
- Make buildings and communications that facilitate applications and service delivery accessible to persons with disabilities; and
- Provide fair housing counseling services or referrals to fair housing agencies.
- County staff provides an outreach by visiting various places of worship or centers visited by those who ordinarily would not be aware of available housing opportunities.
- Staff attends meetings to market the HOME program and CDBG-funded homebuyer training program.

Records of the aforementioned steps and their impact will be maintained by documenting in program files. The HOME program will maintain participant records that include but is not limited to race, ethnicity, and familial status.

Regarding the County's ESG Program, Housing First, Inc. will affirmatively further fair housing in the ESG Program. These efforts will include:

- Marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency through a variety of marketing means;
- Ensuring that applications and service delivery are accessible to persons with disabilities; and
- Referring participants to fair housing agencies for remedy of discrimination in housing, and promoting fair housing choice.

Records of the aforementioned efforts will be maintained by documenting in program files. The ESG program will maintain participant records that include but is not limited to race, ethnicity, and familial status.

PROGRAMS TO ASSIST IN THE PROVISION OF FAIR HOUSING CHOICE

The 2013 Action Plan includes several activities that contribute to the removal of identified barriers to Fair Housing Choice for many households. The Action Plan includes the construction of elderly rental housing and the construction of affordable single family housing which will be available to low- and moderate-income households. The Action Plan activities include ADA-compliant home modifications for homeowners with accessibility problems as well as rehabilitation/accessibility project at a group home.

Additionally, HOME funds are available for down payment and closing cost assistance for first-time homebuyers. Up to \$40,000 in mortgage assistance is available to homebuyers that purchase a house constructed with HOME funds. Mortgage assistance may include down payment and closing cost.

One of the major components of the Action Plan is to provide adequate infrastructure to areas within the County that will bring down the development cost so that affordable homes and apartments will be available throughout the County and not concentrated in any one area. By providing better infrastructure to certain areas in the County, the development cost of land in the County will be reduced. The County's goal is to provide incentives to developers to build more affordable housing and thus increase the supply of affordable homes throughout the County.

The Action Plan activities include homebuyer counseling which is offered at various locations throughout the County in order to increase accessibility for all citizens. This counseling can become a springboard for residents to attend credit counseling, if bad credit prevents them from securing a first mortgage. The classes also provide information regarding fair housing.